

EXHIBIT 1

AFFIDAVIT OF LENA SHOU KUO

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

HEE JIN LOWERY and)
JOHN LOWERY, Individually, and)
as Assignees of Shou & Shou, Inc.,)

Plaintiffs,)

v.)

AMGUARD INSURANCE)
COMPANY,)

Defendant.)

Case No.: 1:20-cv-05148-TWT

AFFIDAVIT OF LENA SHOU KUO

Personally appeared before the undersigned officer duly authorized by law to administer oaths, Lena Shou Kuo who, after being duly sworn, states as follows:

1. My name is Lena Shou Kuo. I am over the age of 21 and not suffering from any disability. I am competent to provide testimony contained herein and provide this affidavit for use in the above captioned case and all other purposes permitted by law. I have personal knowledge of the facts stated herein and attest that they are true and correct.

2. For many years, I and my siblings, Lenny Shou and Lili Shou, have owned various Asian style restaurants in the Atlanta area. In 2013, we had three restaurants which were operated under the name "Noodle." Each restaurant was owned by me and my siblings under separate corporate names. This included the Noodle restaurant located at 3693 Main Street, College Park, Georgia, incorporated as Shou & Shou, Inc.

3. In 2013, I talked to our insurance agent about obtaining insurance for our three Noodle restaurant locations. The agent placed us with AmGuard Insurance Company which issued a business owners policy listing all three locations, including the Noodle Restaurant at 3693 Main Street, College Park, and a workers compensation policy covering the same restaurants. The business owners' policy was renewed every year for five years while the workers compensation policy was renewed only once or twice.

4. Specifically, from 2013 through 2018, AmGuard Insurance Company issued the following business owner's policies:

a. Policy number NOBP404703; policy period September 21, 2013, to September 21, 2014 (Attachment A).

b. Policy number NOBP506733; policy period September 21, 2014, to September 21, 2015 (Attachment B).

c. Policy number NOBP610038; policy period September 21, 2015, to September 21, 2016 (Attachment C).

d. Policy number NOBP749206; policy period September 21, 2016, to September 21, 2017 (Attachment D).

e. Policy number NOBP827149; policy period September 21, 2017, to September 21, 2018 (Attachment E).

f. Policy number NOBP92994; policy period September 21, 2018, to September 21, 2019 (Attachment F).

5. All the business owner policies issued by AmGuard Insurance Company to my family's restaurants named "Noodle, Inc." as the named insured and listed the Noodle College Park restaurant as "LOCATION: 001 BUILDING: 001."

6. "Noodle, Inc." is not the actual corporate name of any of our restaurants. Rather, "Noodle" is merely the tradename of Shou & Shou, Inc. and the other restaurants that were insured.

7. Neither I nor my siblings have ever had any ownership interests in any corporation by the name "Noodle, Inc.," and there has never been a time when any of my family's restaurants was owned or were associated with a corporation named "Noodle, Inc."

8. From the beginning, all premium notices for the aforementioned policies were sent to “Noodle, Inc.” at 3693 Main Street, College Park, Georgia and were paid on Shou & Shou’s operating account.

9. In 2016, a patron by the name of Eled Addus filed a lawsuit for injuries sustained at the Noodle restaurant located at 3693 Main Street, College Park. Through my agent, I turned this lawsuit over to AmGuard Insurance Company to handle. AmGuard assigned an attorney to represent the restaurant, and I cooperated fully.

10. During the *Addus* case, I explained the corporate structure and ownership interests of Shou & Shou, Inc. in the Noodle restaurant located at 3693 Main Street, College Park to the attorney assigned by AmGuard. It is my understanding that the attorney substituted Shou & Shou, Inc. into the lawsuit as the proper party, and he continued to defend us through settlement of the case.

11. At no time during or in response to the *Addus* lawsuit did anyone from AmGuard or otherwise ever inform us that Shou & Shou, Inc. was not insured under the business owners’ policy or that there was any question about coverage for Shou & Shou, Inc. AmGuard did not cancel the policy and did not cease accepting premiums from Shou & Shou, Inc. Rather, it continued to insure us under the tradename Noodle, Inc. and renewed the policy for a fifth time in

September of 2018 with one remaining location, 3693 Main Street, College Park, Georgia 30337.

12. In 2018, a patron by the name of Zuri Zahara Love filed a lawsuit against Shou & Shou, Inc. and others for injuries sustained at the Noodle restaurant located at 3693 Main Street, College Park on December 1, 2016. Through my agent, I turned this lawsuit over to AmGuard Insurance Company to handle.

13. AmGuard Insurance Company assigned an attorney to represent the restaurant in the *Love* lawsuit, and we cooperated fully. We informed the attorney assigned by AmGuard that Noodle is the tradename of the restaurant, but it is owned and operated by Shou & Shou, Inc. doing business as Noodle. After providing the attorney this information, AmGuard did not deny coverage, cancel the policy or cease accepting premiums from Shou & Shou, Inc.

14. In July of 2019, Shou & Shou, Inc. was served with a lawsuit filed by Hee Jin and John Lowery for injuries Mrs. Lowery sustained on July 26, 2017, at the Noodle restaurant located at 3693 Main Street, College Park, Georgia.

15. Through my agent, I turned the *Lowery* lawsuit over to AmGuard Insurance Company to handle. AmGuard Insurance Company refused to defend and indemnify Shou & Shou, Inc. claiming it was not a named insured, additional insured, or otherwise an insured under the policy.

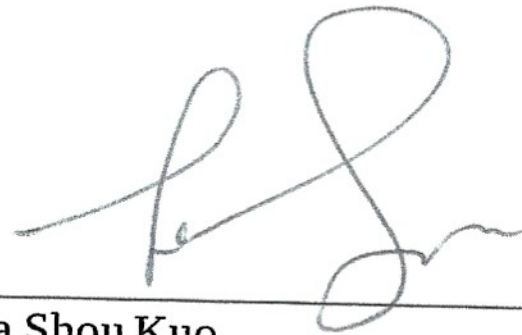
16. Because AmGuard denied coverage, Shou & Shou, Inc. was forced to hire its own attorney and defend itself. We reached a settlement with Plaintiffs in 2020 wherein we agreed to a consent judgment in their favor and an assignment of claims. A true and accurate copy of the consent judgment is attached hereto as Attachment G. A true and accurate copy of the assignment is Attachment H.

17. From September 2013 until AmGuard's denial of coverage in 2019, it was always my belief and understanding that Shou & Shou, Inc. had liability insurance coverage through AmGuard of \$1,000,000.00 per occurrence. Shou & Shou, Inc. paid all of the premiums, and its location at 3693 Main Street, College Park, Georgia was listed as Location 1 on all of the policies. AmGuard hired lawyers to represent Shou & Shou and settled cases brought against it.

18. From the beginning and with each policy renewal, it was my intent that all of my family's Noodle locations be listed as insureds under the policies issued by AmGuard Insurance Company including Shou & Shou, Inc. which owned and operated the Noodle restaurant at 3693 Main Street, College Park, Georgia. From the time AmGuard began insuring my family's restaurants, Shou & Shou, Inc. should have been listed as the named insured or an additional insured.

FURTHER AFFIANT SAYETH NOT.

This 15th day of May, 2022.



Lena Shou Kuo

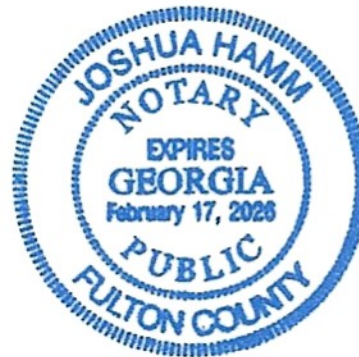
SWORN TO and SUBSCRIBED

before me this 15th day of May 2022.



Notary Public

My Commission Expires: 02/17/26



GUARD00013

BUSINESSOWNER'S POLICY
DECLARATIONS

Issued: 09/24/2013

Policy No.: NOBP404703

Renewal of: NEW

POLICY INFORMATION PAGE

[1] Named Insured and Mailing Address

Noodle Inc
3693 Main Street
College Park, GA 30337

[2] Agency

ASH WELBORN INSURANCE
103 Midway Drive
Suite A
Cornelia, GA 30531

[3] Policy Period

From September 21, 2013 to September 21, 2014, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business

Asian Food

[5] Coverage

This policy consists of the Coverage Forms listed on the **Schedule of Forms and Endorsements (IIT SF 01 05)**.

[6] Premium

The premium shown below may be subject to adjustment.
Certified Acts of Terrorism
TOTAL POLICY PREMIUM
TOTAL PAYABLE

**[7] Payment of Premium**

In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.



ATTACHMENT "A"

GUARD00014**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/24/2013

Policy No.: NOBP404703

Effective Date: 09/21/2013

SECTION I - PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001
3693 Main Street
College Park, GA 30337
Fulton County

Property Deductible: \$1,000

Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales

MANDATORY COVERAGES:**Building**

Limit of Insurance \$430,030

Valuation Replacement Cost

Coverage Includes:

Automatic Increase - Building limit applies up to 2% per year

Business Personal Property

Limit of Insurance \$128,900

Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

OPTIONAL COVERAGES:**BOP Location Level Information****Awnings Coverage**

Limit

\$2,500

Building Coverage

Limit

\$430,030

Valuation

Replacement Cost

Inflation Guard %

2

Business Personal Property Coverage

Limit

\$128,900

Seasonal Increase Percent

25

Liability

Gross Sales at this Location

\$350,000

Limit

Included

Accounts Receivable

On-Premises Limit

\$25,000

Off-Premises Limit

\$25,000

Debris Removal

Limit

25%/\$10,000

Equipment Breakdown Coverage (HSB)

Inspection Contact Name

Lena Shou

Phone Number

404-488-2525

Money and Securities

GUARD00015**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/24/2013

Policy No.: NOBP404703**Effective Date:** 09/21/2013

On Premises Limit	
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	\$5,000
Limit	
Outdoor Property	\$10,000
Limit	
Outdoor Signs - Optional Coverage	\$10,000
Limit	
Restaurant Coverage	\$5,000
Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000
Spoilage Per Occurrence Limit	\$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000
Valuable Papers and Records	
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	
Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000

LOCATION: 002 BUILDING: 001
205 E Ponce De Leon Ave
Decatur, GA 30030
Dekalb County

Property Deductible: \$1,000

Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales

MANDATORY COVERAGES:**Business Personal Property**

Limit of Insurance \$257,700

Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

OPTIONAL COVERAGES:**BOP Location Level Information****Awnings Coverage**

Limit

\$2,500

Business Personal Property Coverage

Limit

\$257,700

Seasonal Increase Percent

25

GUARD00016**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/24/2013

Policy No.: NOBP404703**Effective Date:** 09/21/2013**Liability**

Gross Sales at this Location	\$250,000
Limit	Included

Accounts Receivable

On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000

Debris Removal

Limit	25%/\$10,000
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Equipment Breakdown Coverage (HSB)

Inspection Contact Name	Lena Shou
Phone Number	404-488-2525

Money and Securities

On Premises Limit	\$5,000
Off Premises Limit	\$5,000

Ordinance or Law - Increased Cost Of Construction

Limit	\$10,000
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Outdoor Property

Limit	\$10,000
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Outdoor Signs - Optional Coverage

Limit	\$5,000
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Restaurant Coverage

Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000
Spoilage Per Occurrence Limit	\$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000

Valuable Papers and Records

On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000

Water Back-up and Sump Overflow

Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000

LOCATION: 003 BUILDING: 001
903A W Peachtree St
Atlanta, GA 30309
Fulton County

Property Deductible: \$1,000**Wind/Hail Deductible: N/A****Optional Coverages/Glass Deductible: \$500****Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales****MANDATORY COVERAGES:****Business Personal Property****Limit of Insurance \$257,700**

GUARD00017**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/24/2013

Policy No.: NOBP404703

Effective Date: 09/21/2013

Valuation Replacement Cost**Coverage Includes:**

Seasonal Increase - Business Personal Property limit applies up to 25%

OPTIONAL COVERAGES:**BOP Location Level Information****Awnings Coverage**

Limit \$2,500

Business Personal Property Coverage

Limit \$257,700

Seasonal Increase Percent

25

Liability

Gross Sales at this Location

Limit \$250,000

Accounts Receivable

Included

On-Premises Limit

Off-Premises Limit

\$25,000

\$25,000

Debris Removal

Limit

25%/\$10,000

Equipment Breakdown Coverage (HSB)

Inspection Contact Name

Phone Number

Lena Shou

404-488-2525

Money and Securities

On Premises Limit

Off Premises Limit

\$5,000

\$5,000

Ordinance or Law - Increased Cost Of Construction

Limit

\$10,000

Outdoor Property

Limit

\$10,000

Outdoor Signs - Optional Coverage

Limit

\$5,000

Restaurant Coverage

Food contamination Limit

Advertising Expense Limit

Spoilage Per Occurrence Limit

Brands and Labels

Delivery Errors and Omissions

Fine Arts

Reward Payment

Lock Replacement

Merchandise Withdrawal Expenses

Ordinance or Law - Equipment Coverage

Credit Card Slips

\$10,000

\$3,000

\$10,000

BPP Limit

\$10,000

\$25,000

\$5,000

\$1,000

\$25,000

Building/BPP Limit

\$10,000

Valuable Papers and Records

On-Premises Limit

Off-Premises Limit

\$25,000

\$25,000

Water Back-up and Sump Overflow

Covered Property Limit

Business Income and Extra Expense Limit

\$5,000

\$5,000

GUARD00018**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/24/2013

Policy No.: NOBP404703

Effective Date: 09/21/2013

SECTION II – LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

<u>Coverage</u>	<u>Limits of Insurance</u>
Liability and Medical Expenses - Each Occurrence	\$1,000,000
General Aggregate (Other than Products and Completed Operations)	\$2,000,000
Products & Completed Operations Aggregate	\$2,000,000
Medical Expenses (Each Person)	\$5,000
Liability Property Damage Deductible	None
Liability Deductible - Bodily Injury	None

GUARD00019**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/24/2013

Policy No.: NOBP404703

Effective Date: 09/21/2013

POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Appurtenant Structures	
Limit	\$50,000 combined Building/BPP
Business Income & Extra Expense	
Limit	ALS UP TO 12 MONTHS
Damage To Premises Rented To You	
Limit	\$50,000
Electronic Data	
Limit	\$10,000
Employee Dishonesty	
Limit	\$10,000
Fire Department Service Charge	
Limit	\$25,000
Fire Extinguisher Systems Recharge Expense	
Limit	\$5,000
Forgery or Alteration	
Limit	\$10,000
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	
Property Limit	\$15,000
Business Income/EE Number of Days	30
Fungi or Bacteria Property Damage Aggregate Limit	\$50,000
Glass Expense	
Limit	Actual Loss Sustained
Interruption of Computer Operations	
Limit	\$10,000
Liquor Liability	
Liquor Liability Option	Liquor Liability Coverage
Common Cause Limit	\$1,000,000
Aggregate Limit	\$2,000,000
Gross Annual Liquor Receipts	\$100,000
Loss by Theft of furs, fur garments, garments trimmed with fur	
Limit	\$2,500
Loss by Theft of jewelry, watches, watch movements, jewels, pearls, precious and semi-precious stones, bullion, gold, silver, platinum and other precious alloys or metals	
Limit	\$5,000
Loss by Theft of patterns, dies, molds and forms	
Limit	\$2,500
Money Orders and "Counterfeit Money"	
Limit	\$1,000
Newly Acquired Or Constructed Property - Buildings	
Limit	25% of Building Limit/Not more than \$500,000/Bldg
Newly Acquired Or Constructed Property - Business Personal Property	
Limit	\$250,000
Personal Effects	
Limit	\$5,000
Personal Property Off Premises	
Limit	\$10,000
Pollutant Clean Up and Removal	
Limit	\$10,000
Preservation of Property	
Limit	Within 30 Days
Terrorism	

GUARD00020

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/24/2013

Policy No.: NOBP404703

Effective Date: 09/21/2013

Certified Acts

Include Coverage

GUARD00100

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/16/2014

Policy No.: NOBP506733

Renewal of: NOBP404703

POLICY INFORMATION PAGE**[1] Named Insured and Mailing Address**

Noodle Inc
3693 Main Street
College Park, GA 30337

[2] Agency

ASH WELBORN INSURANCE
103 Midway Drive
Suite A
Cornelia, GA 30531

[3] Policy Period

From September 21, 2014 to September 21, 2015, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business

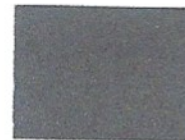
Full-Service Restaurants

[5] Coverage

This policy consists of the Coverage Forms listed on the **Schedule of Forms and Endorsements (IIT SF 01 05)**.

[6] Premium

The premium shown below may be subject to adjustment.
Certified Acts of Terrorism
TOTAL POLICY PREMIUM
TOTAL PAYABLE

**[7] Payment of Premium**

In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.

**ATTACHMENT "B"**

GUARD00101**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/16/2014

Policy No.: NOBP506733

Effective Date: 09/21/2014

SECTION I – PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001
3693 Main Street
College Park, GA 30337
Fulton County

Property Deductible: \$1,000

Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales

MANDATORY COVERAGES:**Building**

Limit of Insurance \$438,631

Valuation Replacement Cost

Coverage Includes:

Automatic Increase - Building limit applies up to 2% per year

Business Personal Property

Limit of Insurance \$128,900

Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

OPTIONAL COVERAGES:**BOP Location Level Information****Awnings Coverage**

Limit

\$2,500

Building Coverage

Limit

\$438,631

Valuation

Replacement Cost

Inflation Guard %

2

Business Personal Property Coverage

Limit

\$128,900

Seasonal Increase Percent

25

Liability

Gross Sales at this Location

Limit

\$350,000

Included

Accounts Receivable

On-Premises Limit

\$25,000

Off-Premises Limit

\$25,000

Debris Removal

Limit

25%/\$10,000

Equipment Breakdown Coverage (HSB)

Inspection Contact Name

Lena Shou

Phone Number

404-488-2525

Money and Securities

GUARD00102**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/16/2014

Policy No.: NOBP506733**Effective Date:** 09/21/2014

On Premises Limit	\$5,000
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	
Limit	\$10,000
Outdoor Property	
Limit	\$10,000
Outdoor Signs - Optional Coverage	
Limit	\$5,000
Restaurant Coverage	
Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000
Spoilage Per Occurrence Limit	\$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000
Valuable Papers and Records	
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	
Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000

LOCATION: 002 BUILDING: 001
205 E Ponce De Leon Ave
Decatur, GA 30030
Dekalb County

Property Deductible: \$1,000

Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales

MANDATORY COVERAGES:**Business Personal Property**

Limit of Insurance \$257,700

Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

OPTIONAL COVERAGES:**BOP Location Level Information****Awnings Coverage**

Limit

\$2,500

Business Personal Property Coverage

Limit

\$257,700

Seasonal Increase Percent

25

GUARD00103**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/16/2014

Policy No.: NOBP506733**Effective Date:** 09/21/2014**Liability**

Gross Sales at this Location	\$250,000
Limit	Included

Accounts Receivable

On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000

Debris Removal

Limit	25%/\$10,000
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Equipment Breakdown Coverage (HSB)

Inspection Contact Name	Lena Shou
Phone Number	404-488-2525

Money and Securities

On Premises Limit	\$5,000
Off Premises Limit	\$5,000

Ordinance or Law - Increased Cost Of Construction

Limit	\$10,000
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Outdoor Property

Limit	\$10,000
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Outdoor Signs - Optional Coverage

Limit	\$5,000
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Restaurant Coverage

Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000
Spoilage Per Occurrence Limit	\$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000

Valuable Papers and Records

On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000

Water Back-up and Sump Overflow

Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000

LOCATION: 003 BUILDING: 001
903A W Peachtree St
Atlanta, GA 30309
Fulton County

Property Deductible: \$1,000**Wind/Hail Deductible: N/A****Optional Coverages/Glass Deductible: \$500****Classification: 09661 - Family-style Restaurants - With sales of alcoholic beverages up to 50% of total sales****MANDATORY COVERAGES:****Business Personal Property****Limit of Insurance \$257,700**

GUARD00104**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/16/2014

Policy No.: NOBP506733

Effective Date: 09/21/2014

Valuation Replacement Cost**Coverage Includes:**

Seasonal Increase - Business Personal Property limit applies up to 25%

OPTIONAL COVERAGES:**BOP Location Level Information****Awnings Coverage**

Limit	\$2,500
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Business Personal Property Coverage

Limit	\$257,700
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Seasonal Increase Percent

25

Liability

Gross Sales at this Location

\$250,000

Limit

Included

Accounts Receivable

On-Premises Limit

\$25,000

Off-Premises Limit

\$25,000

Debris Removal

Limit

25%/\$10,000

Equipment Breakdown Coverage (HSB)

Inspection Contact Name

Lena Shou

Phone Number

404-488-2525

Money and Securities

On Premises Limit

\$5,000

Off Premises Limit

\$5,000

Ordinance or Law - Increased Cost Of Construction

Limit

\$10,000

Outdoor Property

Limit

\$10,000

Outdoor Signs - Optional Coverage

Limit

\$5,000

Restaurant Coverage

Food contamination Limit

\$10,000

Advertising Expense Limit

\$3,000

Spoilage Per Occurrence Limit

\$10,000

Brands and Labels

BPP Limit

Delivery Errors and Omissions

\$10,000

Fine Arts

\$25,000

Reward Payment

\$5,000

Lock Replacement

\$1,000

Merchandise Withdrawal Expenses

\$25,000

Ordinance or Law - Equipment Coverage

Building/BPP Limit

Credit Card Slips

\$10,000

Valuable Papers and Records

On-Premises Limit

\$25,000

Off-Premises Limit

\$25,000

Water Back-up and Sump Overflow

Covered Property Limit

\$5,000

Business Income and Extra Expense Limit

\$5,000

GUARD00105**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/16/2014

Policy No.: NOBP506733

Effective Date: 09/21/2014

SECTION II – LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

<u>Coverage</u>	<u>Limits of Insurance</u>
Liability and Medical Expenses - Each Occurrence	\$1,000,000
General Aggregate (Other than Products and Completed Operations)	\$2,000,000
Products & Completed Operations Aggregate	\$2,000,000
Medical Expenses (Each Person)	\$5,000
Liability Property Damage Deductible	None
Liability Deductible - Bodily Injury	None

GUARD00106**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/16/2014

Policy No.: NOBP506733

Effective Date: 09/21/2014

POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Appurtenant Structures	
Limit	\$50,000 combined Building/BPP
Business Income & Extra Expense	
Limit	ALS UP TO 12 MONTHS
Damage To Premises Rented To You	
Limit	\$50,000
Electronic Data	
Limit	\$10,000
Employee Dishonesty	
Limit	\$10,000
Fire Department Service Charge	
Limit	\$25,000
Fire Extinguisher Systems Recharge Expense	
Limit	\$5,000
Forgery or Alteration	
Limit	\$10,000
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	
Property Limit	\$15,000
Business Income/EE Number of Days	30
Fungi or Bacteria Property Damage Aggregate Limit	\$50,000
Glass Expense	
Limit	Actual Loss Sustained
Interruption of Computer Operations	
Limit	\$10,000
Liquor Liability	
Liquor Liability Option	Liquor Liability Coverage
Common Cause Limit	\$1,000,000
Aggregate Limit	\$2,000,000
Gross Annual Liquor Receipts	\$100,000
Loss by Theft of furs, fur garments, garments trimmed with fur	
Limit	\$2,500
Loss by Theft of jewelry, watches, watch movements, jewels, pearls, precious and semi-precious stones, bullion, gold, silver, platinum and other precious alloys or metals	
Limit	\$5,000
Loss by Theft of patterns, dies, molds and forms	
Limit	\$2,500
Money Orders and "Counterfeit Money"	
Limit	\$1,000
Newly Acquired Or Constructed Property - Buildings	
Limit	25% of Building Limit/Not more than \$500,000/Bldg
Newly Acquired Or Constructed Property - Business Personal Property	
Limit	\$250,000
Personal Effects	
Limit	\$5,000
Personal Property Off Premises	
Limit	\$10,000
Pollutant Clean Up and Removal	
Limit	\$10,000
Preservation of Property	
Limit	Within 30 Days
Terrorism	

GUARD00107

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/16/2014

Policy No.: NOBP506733

Effective Date: 09/21/2014

Certified Acts

Include Coverage

GUARD00166

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/22/2015

AmGUARD Insurance Company
A Stock Company

Policy No.: NOBP610038

Renewal of: NOBP506733

POLICY INFORMATION PAGE**[1] Named Insured and Mailing Address**Noodle Inc
3693 Main Street
College Park, GA 30337**[2] Agency**ASH WELBORN INSURANCE
103 Midway Drive
Suite A
Cornelia, GA 30531**[3] Policy Period**

From September 21, 2015 to September 21, 2016, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business

Full-Service Restaurants

[5] CoverageThis policy consists of the Coverage Forms listed on the **Schedule of Forms and Endorsements (IIT SF 01 05)**.**[6] Premium**The premium shown below may be subject to adjustment.
Certified Acts of Terrorism
TOTAL POLICY PREMIUM
TOTAL PAYABLE**[7] Payment of Premium**

In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.

**ATTACHMENT "C"**

GUARD00167**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/22/2015

Policy No.: NOBP610038

Effective Date: 09/21/2015

SECTION I – PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001
3693 Main Street
College Park, GA 30337
Fulton County

Property Deductible: \$1,000

Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

MANDATORY COVERAGES:**Building**

Limit of Insurance \$447,404

Valuation Replacement Cost

Coverage Includes:

Automatic Increase - Building limit applies up to 2% per year

Business Personal Property

Limit of Insurance \$128,900

Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

OPTIONAL COVERAGES:**Awnings Coverage**

Limit

\$2,500

Building Coverage

Limit

\$447,404

Valuation

Replacement Cost

Inflation Guard %

2

Business Personal Property Coverage

Limit

\$128,900

Seasonal Increase Percent

25

Liability

Gross Sales at this Location

\$350,000

Limit

Included

Accounts Receivable

On-Premises Limit

\$25,000

Off-Premises Limit

\$25,000

Debris Removal

Limit

25%/\$10,000

Equipment Breakdown Coverage (HSB)

GUARD00168**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/22/2015

Policy No.: NOBP610038**Effective Date:** 09/21/2015

Inspection Contact Name	Lena Shou
Phone Number	404-488-2525
Money and Securities	
On Premises Limit	\$5,000
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	
Limit	\$10,000
Outdoor Property	
Limit	\$10,000
Outdoor Signs - Optional Coverage	
Limit	\$5,000
Restaurant Coverage	
Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000
Spoilage Per Occurrence Limit	\$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000
Valuable Papers and Records	
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	
Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000

LOCATION: 002 BUILDING: 001
903A W Peachtree St
Atlanta, GA 30309
Fulton County

Property Deductible: \$1,000

Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

MANDATORY COVERAGES:**Business Personal Property**

Limit of Insurance \$257,700

Valuation Replacement Cost

Coverage Includes:

Seasonal Increase - Business Personal Property limit applies up to 25%

OPTIONAL COVERAGES:**Awnings Coverage**

Limit

\$2,500

Business Personal Property Coverage

GUARD00169**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/22/2015

Policy No.: NOBP610038**Effective Date:** 09/21/2015

Limit	
Seasonal Increase Percent	\$257,700
Liability	25
Gross Sales at this Location	
Limit	\$250,000
Accounts Receivable	Included
On-Premises Limit	
Off-Premises Limit	\$25,000
Debris Removal	\$25,000
Limit	
Equipment Breakdown Coverage (HSB)	25%/\$10,000
Inspection Contact Name	
Phone Number	Lena Shou
Money and Securities	404-488-2525
On Premises Limit	
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	\$5,000
Limit	
Outdoor Property	\$10,000
Limit	
Outdoor Signs - Optional Coverage	\$10,000
Limit	
Restaurant Coverage	\$5,000
Food contamination Limit	
Advertising Expense Limit	\$10,000
Spoilage Per Occurrence Limit	\$3,000
Brands and Labels	\$10,000
Delivery Errors and Omissions	BPP Limit
Fine Arts	\$10,000
Reward Payment	\$25,000
Lock Replacement	\$5,000
Merchandise Withdrawal Expenses	\$1,000
Ordinance or Law - Equipment Coverage	\$25,000
Credit Card Slips	Building/BPP Limit
Valuable Papers and Records	\$10,000
On-Premises Limit	
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	\$25,000
Covered Property Limit	
Business Income and Extra Expense Limit	\$5,000
	\$5,000

GUARD00170**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/22/2015

Policy No.: NOBP610038

Effective Date: 09/21/2015

SECTION II – LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

<u>Coverage</u>	<u>Limits of Insurance</u>
Liability and Medical Expenses - Each Occurrence	\$1,000,000
General Aggregate (Other than Products and Completed Operations)	\$2,000,000
Products & Completed Operations Aggregate	\$2,000,000
Medical Expenses (Each Person)	\$5,000
Liability Property Damage Deductible	None
Liability Deductible - Bodily Injury	None

GUARD00171**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/22/2015

Policy No.: NOBP610038

Effective Date: 09/21/2015

POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Appurtenant Structures	
Limit	\$50,000 combined Building/BPP
Business Income & Extra Expense	
Limit	ALS UP TO 12 MONTHS
Damage To Premises Rented To You	
Limit	\$50,000
Electronic Data	
Limit	\$10,000
Employee Dishonesty	
Limit	\$10,000
Fire Department Service Charge	
Limit	\$25,000
Fire Extinguisher Systems Recharge Expense	
Limit	\$5,000
Forgery or Alteration	
Limit	\$10,000
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	
Property Limit	\$15,000
Business Income/EE Number of Days	30
Fungi or Bacteria Property Damage Aggregate Limit	\$50,000
Glass Expense	
Limit	Actual Loss Sustained
Interruption of Computer Operations	
Limit	\$10,000
Liquor Liability	
Liquor Liability Option	Liquor Liability Coverage
Common Cause Limit	\$1,000,000
Aggregate Limit	\$2,000,000
Gross Annual Liquor Receipts	\$100,000
Loss by Theft of furs, fur garments, garments trimmed with fur	
Limit	\$2,500
Loss by Theft of jewelry, watches, watch movements, jewels, pearls, precious and semi-precious stones, bullion, gold, silver, platinum and other precious alloys or metals	
Limit	\$5,000
Loss by Theft of patterns, dies, molds and forms	
Limit	\$2,500
Money Orders and "Counterfeit Money"	
Limit	\$1,000
Newly Acquired Or Constructed Property - Buildings	
Limit	25% of Building Limit/Not more than \$500,000/Bldg
Newly Acquired Or Constructed Property - Business Personal Property	
Limit	\$250,000
Personal Effects	
Limit	\$5,000
Personal Property Off Premises	
Limit	\$10,000
Pollutant Clean Up and Removal	
Limit	\$10,000
Preservation of Property	
Limit	Within 30 Days
Terrorism	

GUARD00172

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/22/2015

Policy No.: NOBP610038

Effective Date: 09/21/2015

Certified Acts

Include Coverage

GUARD00293

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/14/2016

**AmGUARD Insurance Company
A Stock Company**Policy No.:
NOBP749206

Renewal of: NOBP610038

POLICY INFORMATION PAGE**[1] Named Insured and Mailing Address**Noodle Inc
3693 Main Street
College Park, GA 30337

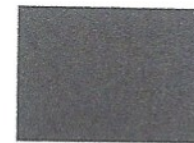
[2] Agency
ASH WELBORN INSURANCE
103 Midway Drive
Suite A
Cornelia, GA 30531

[3] Policy Period
From September 21, 2016 to September 21, 2017, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business
Full-Service Restaurants

[5] Coverage
This policy consists of the Coverage Forms listed on the **Schedule of Forms and Endorsements (IIT SF 01 05)**.

[6] Premium
The premium shown below may be subject to adjustment.
Certified Acts of Terrorism
TOTAL POLICY PREMIUM
TOTAL PAYABLE



[7] Payment of Premium
In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.

**ATTACHMENT "D"**

GUARD00294

BUSINESSOWNER'S POLICY
DECLARATIONS

Issued: 09/14/2016

Policy No.: NOBP749206

Effective Date: 09/21/2016

SECTION I – PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001
 3693 Main Street
 College Park, GA 30337
 Fulton County

Property Deductible: \$1,000

Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

COVERAGES:

Awnings Coverage

Limit	\$2,500
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Building Coverage

Limit	\$456,352
Valuation	Replacement Cost
Inflation Guard %	2

Business Personal Property Coverage

Limit	\$128,900
Seasonal Increase Percent	25

Liability

Gross Sales at this Location	\$350,000
Limit	Included

Accounts Receivable

On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000

Debris Removal

Limit	25%/\$10,000
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Equipment Breakdown Coverage (HSB)

Inspection Contact Name	Lena Shou
Phone Number	404-488-2525

Money and Securities

On Premises Limit	\$5,000
Off Premises Limit	\$5,000

Ordinance or Law - Increased Cost Of Construction

Limit	\$10,000
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Outdoor Property

Limit	\$10,000
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Outdoor Signs - Optional Coverage

Limit	\$5,000
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Restaurant Coverage

Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000

GUARD00295

BUSINESSOWNER'S POLICY
DECLARATIONS

Issued: 09/14/2016

Policy No.: NOBP749206

Effective Date: 09/21/2016

Spoilage Per Occurrence Limit	\$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000
Valuable Papers and Records	
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	
Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000

LOCATION: 002 BUILDING: 001
 903A W Peachtree St
 Atlanta, GA 30309
 Fulton County

Property Deductible: \$1,000

Wind/Hail Deductible: N/A

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

COVERAGES:

Awnings Coverage

Limit	\$2,500
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Business Personal Property Coverage

Limit	\$257,700
Seasonal Increase Percent	25

Liability

Gross Sales at this Location	\$250,000
Limit	Included

Accounts Receivable

On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000

Debris Removal

Limit	25%/\$10,000
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Equipment Breakdown Coverage (HSB)

Inspection Contact Name	Lena Shou
Phone Number	404-488-2525

Money and Securities

On Premises Limit	\$5,000
Off Premises Limit	\$5,000

Ordinance or Law - Increased Cost Of Construction

Limit	\$10,000
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Outdoor Property

Limit	\$10,000
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Outdoor Signs - Optional Coverage

Limit	\$5,000
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GUARD00296**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/14/2016

Policy No.: NOBP749206**Effective Date:** 09/21/2016**Restaurant Coverage**

Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000
Spoilage Per Occurrence Limit	\$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000

Valuable Papers and Records

On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000

Water Back-up and Sump Overflow

Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000

GUARD00297**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/14/2016

Policy No.: NOBP749206

Effective Date: 09/21/2016

SECTION II – LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

<u>Coverage</u>	<u>Limits of Insurance</u>
Liability and Medical Expenses - Each Occurrence	\$1,000,000
General Aggregate (Other than Products and Completed Operations)	\$2,000,000
Products & Completed Operations Aggregate	\$2,000,000
Medical Expenses (Each Person)	\$5,000
Liability Property Damage Deductible	None
Liability Deductible - Bodily Injury	None

GUARD00298

BUSINESSOWNER'S POLICY
DECLARATIONS

Issued: 09/14/2016

Policy No.: NOBP749206

Effective Date: 09/21/2016

POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Appurtenant Structures	
Limit	\$50,000 combined Building/BPP
Business Income & Extra Expense	
Limit	Actual Loss Sustained up to 12 Months
Damage To Premises Rented To You	
Limit	\$50,000
Electronic Data	
Limit	\$10,000
Employee Dishonesty	
Limit	\$10,000
Fire Department Service Charge	
Limit	\$25,000
Fire Extinguisher Systems Recharge Expense	
Limit	\$5,000
Forgery or Alteration	
Limit	\$10,000
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	
Property Limit	\$15,000
Business Income/EE Number of Days	30
Fungi or Bacteria Property Damage Aggregate Limit	\$50,000
Glass Expense	
Limit	Actual Loss Sustained
Interruption of Computer Operations	
Limit	\$10,000
Liquor Liability	
Liquor Liability Option	Liquor Liability Coverage
Common Cause Limit	\$1,000,000
Aggregate Limit	\$2,000,000
Gross Annual Liquor Receipts	\$100,000
Loss by Theft of furs, fur garments, garments trimmed with fur	
Limit	\$2,500
Loss by Theft of jewelry, watches, watch movements, jewels, pearls, precious and semi-precious stones, bullion, gold, silver, platinum and other precious alloys or metals	
Limit	\$5,000
Loss by Theft of patterns, dies, molds and forms	
Limit	\$2,500
Money Orders and "Counterfeit Money"	
Limit	\$1,000
Newly Acquired Or Constructed Property - Buildings	
Limit	25% of Building Limit/Not more than \$500,000/Bldg
Newly Acquired Or Constructed Property - Business Personal Property	
Limit	\$250,000
Personal Effects	
Limit	\$5,000
Personal Property Off Premises	
Limit	\$10,000
Pollutant Clean Up and Removal	
Limit	\$10,000
Preservation of Property	
Limit	Within 30 Days
Terrorism	

GUARD00299

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 09/14/2016

Policy No.: NOBP749206

Effective Date: 09/21/2016

Certified Acts

Include Coverage

GUARD00372

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2017

AmGUARD Insurance Company
A Stock CompanyPolicy No.:
NOBP827149

Renewal of: NOBP749206

POLICY INFORMATION PAGE**[1] Named Insured and Mailing Address**Noodle Inc
3693 Main Street
College Park, GA 30337**[2] Agency**ASH WELBORN INSURANCE
103 Midway Drive
Suite A
Cornelia, GA 30531**[3] Policy Period**

From September 21, 2017 to September 21, 2018, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business

Full-Service Restaurants

[5] CoverageThis policy consists of the Coverage Forms listed on the **Schedule of Forms and Endorsements (IIT SF 01 05)**.**[6] Premium**

The premium shown below may be subject to adjustment.

Certified Acts of Terrorism

TOTAL POLICY PREMIUM

TOTAL PAYABLE

**[7] Payment of Premium**

In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.

**ATTACHMENT "E"**

GUARD00373**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2017

Policy No.: NOBP827149

Effective Date: 09/21/2017

SECTION I – PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001
3693 Main Street
College Park, GA 30337
Fulton County

Property Deductible: \$1,000

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

COVERAGES:**Awnings Coverage**

Limit

\$2,500

Building Coverage

Limit

\$465,479

Valuation

Replacement Cost

Inflation Guard %

2

Business Personal Property Coverage

Limit

\$128,900

Seasonal Increase Percent

25

Valuation

Replacement Cost

Liability

IMPORTANT NOTE

THIS COVERAGE IS RATED BASED ON
AN ESTIMATE AND IS SUBJECT TO
AUDIT

Gross Sales at this Location

Limit

\$350,000

Included

Accounts Receivable

On-Premises Limit

\$25,000

Off-Premises Limit

\$25,000

Debris Removal

Limit

25%/\$10,000

Equipment Breakdown Coverage (HSB)

Inspection Contact Name

Lena Shou

Phone Number

404-488-2525

Money and Securities

On Premises Limit

\$5,000

Off Premises Limit

\$5,000

Ordinance or Law - Increased Cost Of Construction

Limit

\$10,000

Outdoor Property

Limit

\$10,000

Outdoor Signs - Optional Coverage

Limit

\$5,000

GUARD00374**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2017

Policy No.: NOBP827149**Effective Date:** 09/21/2017**Restaurant Coverage**

Food contamination Limit	\$10,000
Advertising Expense Limit	\$3,000
Spoilage Per Occurrence Limit	\$10,000
Brands and Labels	BPP Limit
Delivery Errors and Omissions	\$10,000
Fine Arts	\$25,000
Reward Payment	\$5,000
Lock Replacement	\$1,000
Merchandise Withdrawal Expenses	\$25,000
Ordinance or Law - Equipment Coverage	Building/BPP Limit
Credit Card Slips	\$10,000
Valuable Papers and Records	
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	
Covered Property Limit	\$5,000
Business Income and Extra Expense Limit	\$5,000

LOCATION: 002 BUILDING: 001
903A W Peachtree St
Atlanta, GA 30309
Fulton County

Property Deductible: \$1,000**Optional Coverages/Glass Deductible: \$500****Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales****COVERAGES:****Awnings Coverage**

Limit	\$2,500
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Business Personal Property Coverage

Limit	\$257,700
Seasonal Increase Percent	25
Valuation	Replacement Cost

Liability

IMPORTANT NOTE	
THIS COVERAGE IS RATED BASED ON AN ESTIMATE AND IS SUBJECT TO AUDIT	
Gross Sales at this Location	\$250,000
Limit	Included

Accounts Receivable

On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000

Debris Removal

Limit	25%/\$10,000
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Equipment Breakdown Coverage (HSB)

Inspection Contact Name	Lena Shou
Phone Number	404-488-2525

Money and Securities

On Premises Limit	\$5,000
Off Premises Limit	\$5,000

GUARD00375**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2017

Policy No.: NOBP827149**Effective Date:** 09/21/2017**Ordinance or Law - Increased Cost Of Construction**

Limit

\$10,000

Outdoor Property

Limit

\$10,000

Outdoor Signs - Optional Coverage

Limit

\$5,000

Restaurant Coverage

Food contamination Limit

\$10,000

Advertising Expense Limit

\$3,000

Spoilage Per Occurrence Limit

\$10,000

Brands and Labels

BPP Limit

Delivery Errors and Omissions

\$10,000

Fine Arts

\$25,000

Reward Payment

\$5,000

Lock Replacement

\$1,000

Merchandise Withdrawal Expenses

\$25,000

Ordinance or Law - Equipment Coverage

Building/BPP Limit

Credit Card Slips

\$10,000

Valuable Papers and Records

On-Premises Limit

\$25,000

Off-Premises Limit

\$25,000

Water Back-up and Sump Overflow

Covered Property Limit

\$5,000

Business Income and Extra Expense Limit

\$5,000

GUARD00376**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2017

Policy No.: NOBP827149

Effective Date: 09/21/2017

SECTION II – LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

<u>Coverage</u>	<u>Limits of Insurance</u>
Liability and Medical Expenses - Each Occurrence	\$1,000,000
General Aggregate (Other than Products and Completed Operations)	\$2,000,000
Products & Completed Operations Aggregate	\$2,000,000
Medical Expenses (Each Person)	\$5,000
Liability Property Damage Deductible	None
Liability Deductible - Bodily Injury	None

GUARD00377**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2017

Policy No.: NOBP827149

Effective Date: 09/21/2017

POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Appurtenant Structures	
Limit	\$50,000 combined Building/BPP
Business Income & Extra Expense	
Limit	Actual Loss Sustained up to 12 Months
Damage To Premises Rented To You	
Limit	\$50,000
Electronic Data	
Limit	\$10,000
Employee Dishonesty	
Limit	\$10,000
Fire Department Service Charge	
Limit	\$25,000
Fire Extinguisher Systems Recharge Expense	
Limit	\$5,000
Forgery or Alteration	
Limit	\$10,000
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	
Property Limit	\$15,000
Business Income/EE Number of Days	30
Fungi or Bacteria Property Damage Aggregate Limit	\$50,000
Glass Expense	
Limit	Actual Loss Sustained
Interruption of Computer Operations	
Limit	\$10,000
Liquor Liability	
Liquor Liability Option	Liquor Liability Coverage
Common Cause Limit	\$1,000,000
Aggregate Limit	\$2,000,000
Gross Annual Liquor Receipts	\$100,000
Loss by Theft of furs, fur garments, garments trimmed with fur	
Limit	\$2,500
Loss by Theft of jewelry, watches, watch movements, jewels, pearls, precious and semi-precious stones, bullion, gold, silver, platinum and other precious alloys or metals	
Limit	\$5,000
Loss by Theft of patterns, dies, molds and forms	
Limit	\$2,500
Money Orders and "Counterfeit Money"	
Limit	\$1,000
Newly Acquired Or Constructed Property - Buildings	
Limit	25% of Building Limit/Not more than \$500,000/Bldg
Newly Acquired Or Constructed Property - Business Personal Property	
Limit	\$250,000
Personal Effects	
Limit	\$5,000
Personal Property Off Premises	
Limit	\$10,000
Pollutant Clean Up and Removal	
Limit	\$10,000
Preservation of Property	
Limit	Within 30 Days
Terrorism	

GUARD00378

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2017

Policy No.: NOBP827149

Effective Date: 09/21/2017

Certified Acts

Include Coverage

GUARD00433

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2018

**AmGUARD Insurance Company
A Stock Company**Policy No.:
NOBP929994

Renewal of: NOBP827149

POLICY INFORMATION PAGE**[1] Named Insured and Mailing Address**Noodle Inc
3693 Main Street
College Park, GA 30337

[2] Agency
ASH WELBORN INSURANCE
103 Midway Drive
Suite A
Cornelia, GA 30531

[3] Policy Period
From September 21, 2018 to September 21, 2019, 12:01 AM, standard time at the insured's mailing address.

[4] Description of Business
Full-Service Restaurants

[5] Coverage
This policy consists of the Coverage Forms listed on the **Schedule of Forms and Endorsements (IIT SF 01 05)**.

[6] Premium
The premium shown below may be subject to adjustment.
Certified Acts of Terrorism
TOTAL POLICY PREMIUM
TOTAL PAYABLE



[7] Payment of Premium
In return for your payment of premium, and subject to all terms of this policy, we agree with you to provide insurance as stated in this policy.

**ATTACHMENT "F"**

GUARD00434**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2018

Policy No.: NOBP929994

Effective Date: 09/21/2018

SECTION I - PROPERTY COVERAGES AND LIMITS OF INSURANCE

LOCATION: 001 BUILDING: 001
3693 Main Street
College Park, GA 30337
Fulton County

Property Deductible: \$1,000

Optional Coverages/Glass Deductible: \$500

Classification: 09661 - Family-style Restaurant - Sales of Alcoholic Beverages up to 50% of Total Sales

COVERAGES:

Awnings Coverage	
Limit	\$2,500
Building Coverage	
Limit	\$474,789
Valuation	Replacement Cost
Inflation Guard %	2
Exclude From Blanket?	No
Business Personal Property Coverage	
Limit	\$128,900
Seasonal Increase Percent	25
Valuation	Replacement Cost
Liability	
IMPORTANT NOTE	
THIS COVERAGE IS RATED BASED ON AN ESTIMATE AND IS SUBJECT TO AUDIT	
Gross Sales at this Location	\$350,000
Limit	Included
Accounts Receivable	
On-Premises Limit	\$25,000
Off-Premises Limit	\$25,000
Debris Removal	
Limit	25%/\$10,000
Equipment Breakdown Coverage (HSB)	
Inspection Contact Name	Lena Shou
Phone Number	404-488-2525
Money and Securities	
On Premises Limit	\$5,000
Off Premises Limit	\$5,000
Ordinance or Law - Increased Cost Of Construction	
Limit	\$10,000
Outdoor Property	
Limit	\$10,000
Outdoor Signs - Optional Coverage	

GUARD00435**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2018

Policy No.: NOBP929994**Effective Date:** 09/21/2018

Limit	
Restaurant Coverage	\$5,000
Food contamination Limit	
Advertising Expense Limit	\$10,000
Spoilage Per Occurrence Limit	\$3,000
Brands and Labels	\$10,000
Delivery Errors and Omissions	BPP Limit
Fine Arts	\$10,000
Reward Payment	\$25,000
Lock Replacement	\$5,000
Merchandise Withdrawal Expenses	\$1,000
Ordinance or Law - Equipment Coverage	\$25,000
Credit Card Slips	Building/BPP Limit
Valuable Papers and Records	\$10,000
On-Premises Limit	
Off-Premises Limit	\$25,000
Water Back-up and Sump Overflow	\$25,000
Covered Property Limit	
Business Income and Extra Expense Limit	\$5,000
	\$5,000

GUARD00436**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2018

Policy No.: NOBP929994

Effective Date: 09/21/2018

SECTION II – LIABILITY COVERAGES AND LIMITS OF INSURANCE

Each paid claim for the following coverages reduces the amount of insurance we provide during the applicable annual period. Please refer to Section II – Liability in the Businessowners Coverage form and any attached endorsements.

<u>Coverage</u>	<u>Limits of Insurance</u>
Liability and Medical Expenses - Each Occurrence	\$1,000,000
General Aggregate (Other than Products and Completed Operations)	\$2,000,000
Personal & Advertising Injury	Included
Products & Completed Operations Aggregate	\$2,000,000
Medical Expenses (Each Person)	\$5,000
Liability Property Damage Deductible	None
Liability Deductible - Bodily Injury	None

GUARD00437

BUSINESSOWNER'S POLICY
DECLARATIONS

Issued: 08/17/2018

Policy No.: NOBP929994

Effective Date: 09/21/2018

POLICY WIDE COVERAGES AND LIMITS OF INSURANCE

Appurtenant Structures	
Limit	\$50,000 combined Building/BPP
Business Income & Extra Expense	
Limit	Actual Loss Sustained up to 12 Months
Damage To Premises Rented To You	
Limit	\$50,000
Electronic Data	
Limit	\$10,000
Employee Dishonesty	
Limit	\$10,000
Fire Department Service Charge	
Limit	\$25,000
Fire Extinguisher Systems Recharge Expense	
Limit	\$5,000
Forgery or Alteration	
Limit	\$10,000
Fungi, Wet Rot, Dry Rot & Bacteria (Mold)	
Property Limit	\$15,000
Business Income/EE Number of Days	30
Fungi or Bacteria Property Damage Aggregate Limit	\$50,000
Glass Expense	
Limit	Actual Loss Sustained
Interruption of Computer Operations	
Limit	\$10,000
Liquor Liability	
Liquor Liability Option	Liquor Liability Coverage
Common Cause Limit	\$1,000,000
Aggregate Limit	\$2,000,000
Gross Annual Liquor Receipts	\$100,000
IMPORTANT NOTE	THIS COVERAGE IS RATED BASED ON AN ESTIMATE AND IS SUBJECT TO AUDIT
Loss by Theft of furs, fur garments, garments trimmed with fur	
Limit	\$2,500
Loss by Theft of jewelry, watches, watch movements, jewels, pearls, precious and semi-precious stones, bullion, gold, silver, platinum and other precious alloys or metals	
Limit	\$5,000
Loss by Theft of patterns, dies, molds and forms	
Limit	\$2,500
Money Orders and "Counterfeit Money"	
Limit	\$1,000
Newly Acquired Or Constructed Property - Buildings	
Limit	25% of Building Limit/Not more than \$500,000/Bldg
Newly Acquired Or Constructed Property - Business Personal Property	
Limit	\$250,000
Personal Effects	
Limit	\$5,000
Personal Property Off Premises	
Limit	\$10,000
Pollutant Clean Up and Removal	
Limit	\$10,000

GUARD00438

**BUSINESSOWNER'S POLICY
DECLARATIONS**

Issued: 08/17/2018

Policy No.: NOBP929994

Effective Date: 09/21/2018

Preservation of Property

Limit

Terrorism

Within 30 Days

Certified Acts

Include Coverage

IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA

HEE JIN LOWERY and JOHN LOWERY,

Plaintiffs,

v.

NOODLE LIFE, INC.,
SHOU & SHOU, INC.,

Defendants

CIVIL ACTION FILE NO.:

19A75644

CONSENT JUDGMENT AS TO SHOU & SHOU, INC.

WHEREAS, Plaintiffs and Defendant Shou & Shou, Inc. agree to a consent judgment in the amount of \$900,000.00 in favor of Plaintiff Hee Jin Lowery against Defendant Shou & Shou, Inc. and \$100,000.00 in favor of Plaintiff John Lowery against Defendant Shou & Shou, Inc.; and

WHEREAS, as consideration for this consent judgment, Plaintiffs have agreed not to satisfy or attempt to satisfy any amounts owed under this judgment against the personal assets of Defendant Shou & Shou, Inc., and to only satisfy this judgment to the extent that the defendant's insurer and/or insurance broker can be held responsible for the judgment; and

WHEREAS, in further consideration of this consent judgment, Defendant Shou & Shou, Inc. has agreed to assign any claims it has against his/her insurer AmGUARD Insurance Company and any other insurance company and its insurance broker, to Plaintiffs; and

WHEREAS, this consent judgment represents a compromise settlement of Plaintiffs' claims against Shou & Shou, Inc. to avoid the uncertainties of trial and does not fully and completely compensate Plaintiffs for all economic and non-economic damages.

ATTACHMENT G

IT IS HEREBY ORDERED AND ADJUDGED that judgment be entered in favor of plaintiff Hee Jin Lowery against Defendant Shou & Shou, Inc. in the amount of \$900,000.00 with post-judgment interest as allowed by law, that judgment be entered in favor of plaintiff John Lowery against Defendant Shou & Shou, Inc. in the amount of \$100,000.00 with post-judgment interest as allowed by law, and that Defendant Shou & Shou, Inc. execute an assignment to the Plaintiffs of its claims against its insurer, AmGUARD Insurance Company, and any other insurance company and against its insurance broker in order for Plaintiffs to pursue collection of this judgment.

FURTHER, pursuant to O.C.G.A. § 9-11-54(b), the Court finds no just reason for delay and expressly directs entry of final judgment as set forth above in favor of Plaintiffs Hee Jin Lowery and John Lowery. Plaintiffs' action against Defendant Noodle Life, Inc. will remain pending and proceed to trial.

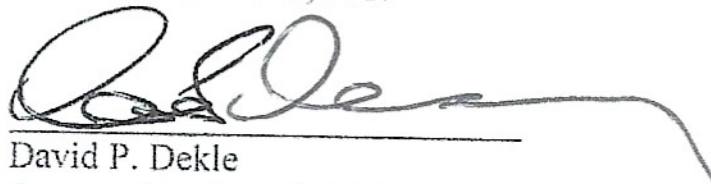
SO ORDERED this 6th day of July, 2020.



HONORABLE KIMBERLY ANDERSON
Judge, State Court of DeKalb County

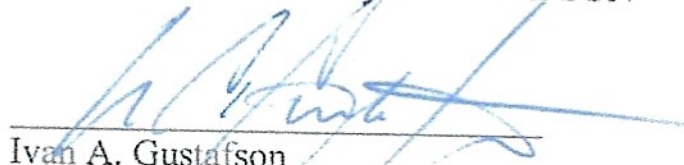
CONSENTED TO:

DAVID P. DEKLE, P.C.



David P. Dekle
Georgia Bar No. 216590
3506 Professional Circle
Suite A
Augusta, Georgia 30907

LAW OFFICE OF IVAN GUSTAFSON



Ivan A. Gustafson
Georgia Bar No. 001630
69 Lawrenceville St.
McDonough, GA 30253
Telephone: (770) 626-1626

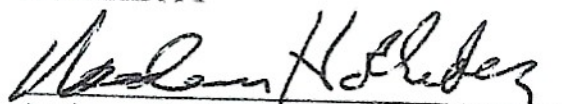
STATE COURT OF
DEKALB COUNTY, GA.
7/7/2020 11:31 AM
E-FILED
BY: Michelle Cheek

Telephone: (706) 922-7460
Facsimile: (706) 243-4656

Facsimile: (770) 212-2345

THE LAW OFFICE OF ANDREW
HOLLIDAY

Attorney for Defendants
Shou & Shou, Inc.



Andrew W. Holliday
Georgia Bar No. 74692
11175 Cicero Drive
Suite 100

Alpharetta, Georgia 30022

Telephone: (678) 646-6711

Facsimile: (678) 802-2129

LaDPD
u/express
permission

Attorneys for Plaintiffs

ASSIGNMENT AND COVENANT NOT TO SEEK COMPENSATION
DIRECTLY FROM SHOU & SHOU, INC.

For and in consideration of the sum of one dollar and other good and valuable consideration, the acceptance of which is hereby acknowledged, Shou & Shou, Inc. sells, assigns and transfers all of its right, title and interest, which exists now, or which may exist in the future, to any and all claims or rights of any kind against AmGUARD Insurance Company or any other insurer for failing to defend, prosecute, settle, pay or otherwise resolve the claims of Hee Jin Lowery and John Lowery against Shou & Shou, Inc. including, but not limited to, failing to defend, prosecute, settle, pay or otherwise resolve the claims pending in the case styled *Hee Jin Lowery and John Lowery v. Noodle Life, Inc. and Shou & Shou, Inc.* pending in State Court of DeKalb County, State of Georgia, Civil Action No. 19A75644.

In particular, this assignment is designed and intended to allow Hee Jin Lowery and John Lowery to prosecute an action against AmGUARD Insurance Company or any other insurer to recover the consent judgment they obtained against Shou & Shou, Inc. arising out of an incident that occurred on or about July 26, 2017, in the action captioned *Hee Jin Lowery and John Lowery v. Noodle Life, Inc. and Shou & Shou, Inc.* pending in State Court of DeKalb County, State of Georgia, Civil Action No. 19A75644, (A copy of the consent judgment is attached as Exhibit "A"), including, but not limited to, any claims for negligent failure to settle, bad faith failure to settle and wrongful denial of coverage.

In addition to the sum of one dollar, and as further consideration for this assignment and in exchange for this assignment, Hee Jin Lowery and John Lowery promise to forgo any right to seek compensation directly from Shou & Shou, Inc. Instead, Hee Jin Lowery and John Lowery



ATTACHMENT H

promise to pursue the complete amount of the compensation owed them by Shou & Shou, Inc. directly from AmGUARD Insurance Company or other insurers and from its insurance broker.

Additionally, for and in consideration of the sum of one dollar and other good and valuable consideration, the acceptance of which is hereby acknowledged, Shou & Shou, Inc. sells, assigns and transfers all of its right, title and interest, which exists now, or which may exist in the future, to any and all claims or rights of any kind against its insurance broker, Ash Welborn Insurance Agency, its agents and employees, for breach of contract, negligence and all other causes of action, known and unknown, for failure to procure insurance. In particular, this assignment is designed and intended to allow Hee Jin Lowery and John Lowery to prosecute an action against Ash Welborn Insurance Agency, its agents and employees or any other insurance broker for failing to procure insurance for Shou & Shou, Inc. in the amount of \$1 million dollars which would have been in full force and effect on or about July 26, 2017, when injury and damage to Hee Jin and John Lowery occurred.

Shou & Shou, Inc. further agrees to assist the Plaintiffs in the prosecution of any assigned claims, including but not limited to: (a) providing Plaintiffs with open access to its books, records, employees, documents and evidence, to the extent that is reasonably required to effectuate a successful prosecution of any assigned claims; and (b) executing any documents necessary to assign to Plaintiffs Shou & Shou's rights under any policy issued by any of Defendant's liability insurance carriers that may benefit the Plaintiffs.

This assignment is to be interpreted under the laws of Georgia, and the parties hereto intend for it to be interpreted to allow Hee Jin and John Lowery to pursue AmGUARD Insurance Company or any other insurers and Ash Welborn Insurance Agency, its agents and employees,



for the full amount of the judgment they obtained against Shou & Shou, Inc., including penalties, post judgment interest, and all other damages allowed by law.

This 24 day of June, 2020.

Lena Shou

Shou & Shou, Inc. By:
Lena Shou Kuo

[Signature]



Sworn to and subscribed before me

this 24 day of June, 2020.

[Signature]

Notary Public

My commission expires:

May 20, 2022

Approved by:

[Signature]
Ivan A. Gustafson

[Signature]
Hee Jin Lowery

[Signature]
John Lowery

Sworn to and subscribed before me

this 8th day of July, 2020.

[Signature]

Notary Public

My commission expires:

2027



Approved by:

[Signature]
David P. Dekle